

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY,

Plaintiff,

v.

HYUNDAI MOTOR  
MANUFACTURING, ALABAMA,  
LLC; HYUNDAI ENG AMERICA,  
INC.; and DYNAMIC SECURITY,  
INC.

Defendants.

Case No. 2:19-CV-767-ECM

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**PLAINTIFF'S WILL USE EXHIBIT 36**

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**From:** Williams, Cassandra - Hyundai ENG America <CWilliams@hmmausa.com>  
**Sent:** Tuesday, November 13, 2018 6:37 PM  
**To:** Whitehead, Chris HMMA/Legal; scduke@hec.co.kr; Inkyu Kwak  
**Subject:** FW: EEOC COMPLAINT  
**Attachments:** Position Statement 846-2017-32787.pdf; EEOC Form 5 Key Davita.pdf

Chris, Mr. Yu, and Mr. Kwak

This afternoon (Tuesday November 13, 2018) I forwarded a copy of the EEOC Complaint filed by Davita Key to Dynamic Security Corporate office. I was informed that Kristal Riddle with Dynamic Security handles all EEOC Complaints. Kristal reviewed the complaint HMMA received and responded back attaching a written statement and complaint that they received in September 2017 regarding Davita Key' allegations (see below email and attachments).

Thanks



Cassandra Williams  
Manager of Security Services  
Hyundai ENG America, Inc.  
Hyundai Motor Manufacturing Alabama, LLC  
T (334) 387-8913 E [CWilliams@hmmausa.com](mailto:CWilliams@hmmausa.com)  
F (334) 387-8949  
C (706) 590-8773

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**From:** Kristal Riddle [mailto:klriddle@dynamicsecurity.org]  
**Sent:** Tuesday, November 13, 2018 4:11 PM  
**To:** Sherry Spires  
**Cc:** Williams, Cassandra - Hyundai ENG America; Williams, Malinda  
**Subject:** Re: EEOC COMPLAINT

Ms. Key filed against Dynamic Security for Title VII violations regarding discrimination based upon race, sex (pregnancy) and retaliation. As you can see from the attached EEOC Form 5, the allegations are similar enough but with distinct differences based on her whether her accusations fall against Dynamic vs Hyundai.

Cassandra, please feel free to pass along the attached Form 5 and the Position Statement which I submitted on behalf of Dynamic Security on September 1, 2017 to whomever would be in the position to respond to the EEOC's letter. I will be happy to share any of our files which I feel can be helpful to Hyundai.

If counsel would like to reach out to me to discuss the Dynamic position statement, please pass along my email address to whomever that might be.

Thank you,

Kristal Riddle  
Legal Affairs Coordinator

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**From:** Sherry Spires <[sspires@dynamicsecurity.org](mailto:sspires@dynamicsecurity.org)>  
**To:** Kristal Riddle <[klriddle@dynamicsecurity.org](mailto:klriddle@dynamicsecurity.org)>  
**Cc:** Williams Cassandra - Hyundai ENG America <[cwilliams@hmmausa.com](mailto:cwilliams@hmmausa.com)>; Malinda Williams <[malinda.williams@hmmausa.com](mailto:malinda.williams@hmmausa.com)>  
**Sent:** Tuesday, November 13, 2018 2:32 PM  
**Subject:** Fw: EEOC COMPLAINT

Cassandra and Malinda: I'm forwarding this email to Kristal Riddle, as she handles our EEOC Charges.

Kristal: This name is familiar to me. I know I have a file and/or an unemployment file on her. I'll forward to you as soon as I can find it.

Sherry

----- Forwarded Message -----

**From:** "Williams, Cassandra - Hyundai ENG America" <[CWilliams@hmmausa.com](mailto:CWilliams@hmmausa.com)>  
**To:** Tracy Peoples <[peoplestracy06@yahoo.com](mailto:peoplestracy06@yahoo.com)>; "sspires@dynamicsecurity.org" <[sspires@dynamicsecurity.org](mailto:sspires@dynamicsecurity.org)>  
**Cc:** "MARTRISE REED (TREED@DYNAMICSECURITY.ORG)" <[TREED@DYNAMICSECURITY.ORG](mailto:TREED@DYNAMICSECURITY.ORG)>; Greg Carter <[gcarter@dynamicsecurity.org](mailto:gcarter@dynamicsecurity.org)>; "Williams, Malinda" <[Malinda.Williams@hmmausa.com](mailto:Malinda.Williams@hmmausa.com)>  
**Sent:** Tuesday, November 13, 2018 2:20 PM  
**Subject:** EEOC COMPLAINT



Tracy and Sherry,

Please see attached copy of an EEOC Complaint filed by Davita Key that was hired for the Mailroom last year. You may have already received a copy of it. I can tell you most of the allegations stated are fabricated and/or embellished.

Thanks



Cassandra Williams  
Manager of Security Services  
Hyundai ENG America, Inc.  
Hyundai Motor Manufacturing Alabama, LLC  
T (334) 387-8913 E [CWilliams@hmmausa.com](mailto:CWilliams@hmmausa.com)  
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